| 1  | Thomas Friedman, Esq. (Bar #7708)   |   |  |  |  |
|----|---|---|--|--|--|
| 2  | BROWN, BONN & FRIEDMAN, LLP<br>5528 South Fort Apache Road  |   |  |  |  |
| 3  | T as Marca NTM 90149  |   |  |  |  |
| 4  | 1 (700) 040 2001 For  |   |  |  |  |
| 5  |   |   |  |  |  |
| 6  | Attorneys for Defendants:  IDS PROPERTY & CASUALTY INSURANCE COMPANY;  AMERIPRISE AUTO & HOME INSURANCE COMPANY;  AMERIPRISE INSURANCE COMPANY;  AMERIPRISE AUTO & HOME INSURANCE AGENCY, INC.; and  AMERIPRISE FINANCIAL, INC. |   |  |  |  |
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| 9  | AMERICASE TIVALVOIAE, IVC.  |   |  |  |  |
| 10 | UNITED STATES DISTRICT COURT  |   |  |  |  |
| 11 | DISTRICT OF NEVADA  |   |  |  |  |
| 12 | JULIE MATHIS, an individual; MARLYS   |   |  |  |  |
| 13 | PLUMER, an individual; and CYNTHIA<br>SUTHERLAND, in her Capacity As Special  | CASE NO.: 2:16-cv-02069-APG-GWF<br>Consolidated with Case No.: 3:17-cv-00214- |  |  |  |
| 14 | Administrator of the Estates of Robert Mathis   | HDM-VPC   |  |  |  |
| 15 | and Linda Mathis,   | (ELECTRONIC FILING CASE)  |  |  |  |
| 16 | Plaintiffs,   | STIPULATION AND ORDER FOR   |  |  |  |
| 17 | vs.   | DISMISSAL WITH PREJUDICE FROM COMPLAINT                                       |  |  |  |
| 18 | IDS PROPERTY & CASUALTY INSURANCE   |   |  |  |  |
| 19 | COMPANY, a Wisconsin Corporation;<br>AMERIPRISE AUTO & HOME INSURANCE   |   |  |  |  |
| 20 | COMPANY, a Wisconsin Corporation;<br>AMERIPRISE INSURANCE COMPANY, a  |   |  |  |  |
|    | Wisconsin Corporation; AMERIPRISE AUTO &  |   |  |  |  |
|    | HOME INSURANCE AGENCY, INC., a<br>Wisconsin Corporation, AMERIPRISE   |   |  |  |  |
| 23 | FINANCIAL, INC., a Delaware Corporation,  |   |  |  |  |
| 24 | Defendants.   |   |  |  |  |
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STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE FROM COMPLAINT

## STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE FROM COMPLAINT

COMES NOW, Plaintiff, JULIE MATHIS, by and through her attorney, James W. Puzey, Esq., of the law firm of HOLLEY, DRIGGS, WALCH, FINE, WRAY, PUZEY & THOMPSON, and Plaintiff MARLYS PLUMER, by and through her attorneys Calvin R. X. Dunlap, Esq. and Monique Laxalt, Esq. of the law firm of DUNLAP & LAXALT, and Plaintiff CYNTHIA SUTHERLAND, in her Capacity As Special Administrator of the Estates of Robert Mathis and Linda Mathis, by and through her attorney, Charles B. Woodman, Esq. of the LAW OFFICES OF CHARLES B. WOODMAN, ESQ., and Defendants IDS PROPERTY & CASUALTY INSURANCE COMPANY; AMERIPRISE AUTO & HOME INSURANCE COMPANY; AMERIPRISE INSURANCE COMPANY; AMERIPRISE AUTO & HOME INSURANCE AGENCY, INC. and AMERIPRISE FINANCIAL, INC., by and through their attorney, Thomas Friedman, of the law firm of BROWN, BONN & FRIEDMAN, LLP, and hereby agree to stipulate to dismiss Defendants IDS PROPERTY & CASUALTY INSURANCE COMPANY; AMERIPRISE AUTO & HOME INSURANCE COMPANY; AMERIPRISE INSURANCE COMPANY; AMERIPRISE AUTO & HOME INSURANCE AGENCY, INC. and AMERIPRISE FINANCIAL, INC., with prejudice, each party to bear its own attorney's fees and costs.

Furthermore, IDS PROPERTY & CASUALTY INSURANCE COMPANY brought a Declaratory Relief Action, consolidated case number 2:16-cv-02069-APG-GWF, naming JULIE MATHIS, MARLYS PLUMER and CYNTHIA SUTHERLAND, in her Capacity as Special Administrator of the Estates of Robert Mathis and Linda Mathis, and the parties hereby agree to stipulate to dismiss this Declaratory Relief Action as well, each party to bear its own attorney's fees and costs.

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| 1  | This Stipulation is entered into in good               | faith, in the interests of judicial economy and not  |
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| 2  | for the purposes of delay.                             |  |
| 3  | Dated: May <u>14</u> , 2018.                           | Dated: May, 2018.  |
| 4  | HOLLEY, DRIGGS, WALCH, FINE,                           | LAW OFFICES OF CHARLES B.  |
| 5  | WRAY, PUZEY & THOMPSON                                 | WOODMAN, ESQ.  |
| 6  | James W. Luzus   |  |
| 7  | James W. Puzey, Esq. (Bar #5745)                       | Charles B. Woodman, Esq. (Bar #5171)   |
| 8  | 800 S. Meadows Parkway, Sulite 800<br>Reno, NV 89521   | 548 W. Plumb Lane, Suite B<br>Reno, NV 89509   |
| 9  | Attorneys for Plaintiff                                | Attorneys for Plaintiff  |
| 10 | JULIE MATHIS   | CYNTHIA SUTHERLAND in her Capacity As Special Administrator of the Estates of Robert Mathis and Linda Mathis |
| 11 |  |  |
| 12 | Dated: May, 2018.                                      | Dated: May $\overline{Z}$ , 2018.  |
| 13 | DUNLAP AND LAXALT                                      | BROWN, BONN & FRIEDMAN, LLP  |
| 14 |  | My 2   |
| 15 | Calvin R. X. Dunlap, Esq. (Bar #2111)                  | Thomas Friedman, Esq. (Bar #7708)  |
| 16 | Monique Laxalt, Esq. (Bar #1969)<br>537 Ralston Street | 5528 South Fort Apache Road<br>Las Vegas, NV 89148   |
| 17 | P.O. Box 3689  | Attorneys for Defendants   |
| 18 | Reno, NV 89503 Attorneys for Plaintiff                 | IDS PROPERTY & CASUALTY INSURANCE COMPANY;   |
| 19 | MARLYS PLUMER  | AMERIPRISE AUTO & HOME INSURANCE COMPANY;  |
| 20 |  | AMERIPRISE INSURANCE COMPANY;  |
| 21 |  | AMERIPRISE AUTO & HOME INSURANCE AGENCY, INC.; and   |
| 22 |  | AMERIPRISE FINANCIAL, INC.   |
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| 1   | This Stipulation is entered into in good faith, in the interests of judicial economy and no  |   |
|---|--|---|
| 2   | for the purposes of delay.   |   |
| 3   | Dated: May, 2018.  | Dated: May, 2018.   |
| 5   | HOLLEY, DRIGGS, WALCH, FINE,<br>WRAY, PUZEY & THOMPSON   | LAW OFFICES OF CHARLES B. WOODMAN, ESQ.   |
| 6   |  |   |
| 7<br>8<br>9<br>10   | James W. Puzey, Esq. (Bar #5745)<br>800 S. Meadows Parkway, Suite 800<br>Reno, NV 89521<br>Attorneys for Plaintiff<br>JULIE MATHIS                           | Charles B. Woodman, Esq. (Bar #5171) 548 W. Plumb Lane, Suite B Reno, NV 89509 Attorneys for Plaintiff CYNTHIA SUTHERLAND in her Capacity As Special Administrator of the Estates of Robert Mathis and Linda Mathis   |
| 12  | Dated: May, 2018.  | Dated: May, 2018.   |
| 13<br>14.   | DUNLAP AND LAXALT  | BROWN, BONN & FRIEDMAN, LLP   |
| 15.16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24<br>25<br>26<br>27 | Calvin R. X. Dunlap, Esq. (Bar #2111) Monique Laxalt, Esq. (Bar #1969) 537 Ralston Street P.O. Box 3689 Reno, NV 89503 Attorneys for Plaintiff MARLYS PLUMER | Thomas Friedman, Esq. (Bar #7708) 5528 South Fort Apache Road Las Vegas, NV 89148 Attorneys for Defendants IDS PROPERTY & CASUALTY INSURANCE COMPANY; AMERIPRISE AUTO & HOME INSURANCE COMPANY; AMERIPRISE INSURANCE COMPANY; AMERIPRISE AUTO & HOME INSURANCE AGENCY, INC.; and AMERIPRISE FINANCIAL, INC. |
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| 1           | This Stipulation is entered into in good faith, in the interests of judicial economy and no |  |
|-------------|---|--|
| 2           | for the purposes of delay.  |  |
| 3           | Dated: May <u>14</u> , 2018.  | Dated: May, 2018.  |
| 4<br>5      | HOLLEY, DRIGGS, WALCH, FINE,<br>WRAY, PUZEY & THOMPSON                                      | LAW OFFICES OF CHARLES B. WOODMAN, ESQ.  |
| 6           |   |  |
| 7           | Will W. Mayer   | Charles D. Wasdman Egg (Day #5171)   |
| 8           | James W. Puzey, Esq. (Bar #5745)<br>80% S. Meadows Parkway, Suite 800<br>Reno, NV 89521     | Charles B. Woodman, Esq. (Bar #5171)<br>548 W. Plumb Lane, Suite B<br>Reno, NV 89509 |
| 9           | Attorneys for Plaintiff JULIE MATHIS  | Attorneys for Plaintiff CYNTHIA SUTHERLAND in her Capacity                           |
| 10          | JULIE WATHIS  | As Special Administrator of the Estates of Robert Mathis and Linda Mathis            |
| 11<br>12    | Dated: May, 2018.   | Dated: May, 2018.  |
| 13          | DUNLAP AND LAXALT   | BROWN, BONN & FRIEDMAN, LLP  |
| 14          |   |  |
| 15          | Calvin R. X. Dunlap, Esq. (Bar #2111)   | Thomas Friedman, Esq. (Bar #7708)  |
| 16          | Monique Laxalt, Esq. (Bar #1969)  | 5528 South Fort Apache Road  |
| 17          | 537 Ralston Street<br>P.O. Box 3689   | Las Vegas, NV 89148 Attorneys for Defendants   |
| 18          | Reno, NV 89503 Attorneys for Plaintiff  | IDS PROPERTY & CASUALTY INSURANCE COMPANY;   |
| 19          | MARLYS PLUMER   | AMERIPRISE AUTO & HOME   |
| 20          |   | INSURANCE COMPANY;<br>AMERIPRISE INSURANCE COMPANY;                                  |
| 21          |   | AMERIPRISE AUTO & HOME INSURANCE AGENCY, INC.; and                                   |
| 22          |   | AMERIPRISE FINANCIAL, INC.   |
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## ORDER The parties have stipulated and agreed to the dismissal of all parties and all claims in these consolidated cases, as set forth in the Stipulation, and good cause appearing. IT IS HEREBY ORDERED, ADJUDGED AND DECREED that all claims between all parties in this consolidated action be dismissed with prejudice, each party to bear their own respective attorney's fees and costs herein. Dated: June 20, 2018. Honorable Andrew P. Gordon JUDICIAL DISTRICT COURT JUDGE Submitted by: 12 BROWN, BONN & FRIEDMAN, LLP 13 14 Thomas Friedman, Esq. (Bar #7708) 15 BROWN, BONN & FRIEDMAN, LLP 5528 South Fort Apache Road 16 Las Vegas NV 89148 17 (702) 942-3900 (702) 942-3901 FAX 18 tfriedman@brownbonn.com Attorneys for Defendants 19 IDS PROPERTY & CASUALTY INSURANCE COMPANY; AMERIPRISE AUTO & HOME INSURANCE COMPANY; 20 AMERIPRISE INSURANCE COMPANY; AMERIPRISE AUTO & HOME INSURANCE AGENCY, INC.; 21 and AMERIPRISE FINANCIAL, INC 22 23 24 25 26

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